

IN THE COURT OF COMMON PLEAS  
MONTGOMERY COUNTY, OHIO

<b>MIAMI VALLEY HOSPITAL</b>	)	CASE NO.
One Wyoming Street	)	
Dayton, OH 45409	)	JUDGE
	)	
Plaintiff,	)	<b><u>COMPLAINT</u></b>
	)	
v.	)	
	)	
<b>ANTHEM BLUE CROSS BLUE</b>	)	
<b>SHIELD</b>	)	
<b>c/o Registered Agent</b>	)	
Community Insurance Company	)	
120 Monument Circle	)	
Indianapolis, IN 46204	)	
	)	
Defendant.	)	

NOW COMES Plaintiff, Miami Valley Hospital, by and through its counsel, and for its cause of action against Anthem Blue Cross Blue Shield, says that:

1. The within cause of action arose in Montgomery County, Ohio.
2. At all times relevant, Plaintiff, Miami Valley Hospital, was a not-for-profit corporation, registered in the State of Ohio, conducting business as a hospital.
3. At all times relevant, Defendant Anthem Blue Cross Blue Shield which upon information and belief, is an insurance company licensed and doing business in the State of Ohio.
4. Plaintiff provided medical service to Kristen Hardin, who was an insured of Defendant Anthem Blue Cross Blue Shield from 09/05/2018 through 09/07/2018, further identified as patient account no. \*\*\*\*\*3147.
5. Following Kristen Hardin's discharge, a bill was submitted to Defendant in the amount of \$28,675.96 for services rendered from 09/05/2018 through 09/07/2018. A copy of the account statement is not attached to the Complaint in order to protect the patient's personal

health information. However, a statement was provided to Defendant, and one will be provided to the Court upon request and under seal.

6. In addition to the bill, Ms. Hardin had assigned all of her insurance benefits to the hospital. (Exhibit A).

7. Defendant Anthem Blue Cross Blue Shield paid the insured directly, in violation of state law and the attached assignment and is now denying further payment of the claim.

8. Defendant is indebted to Plaintiff in the amount of \$28,675.93 for medical services rendered.

9. Demand has been made upon Defendant to liquidate the balance; however, Defendant has failed to do so.

WHEREFORE, Plaintiff, Miami Valley Hospital, prays that this Court grant Plaintiff judgment against Defendant, Anthem Blue Cross Blue Shield, in the amount of \$28,675.93 together with interest at the statutorily allowed rate from the date of judgment and costs of the within action.

Respectfully submitted,

**DREYFUSS WILLIAMS & ASSOCIATES CO., L.P.A.**

By: 

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